

REMARKS

The independent claims 1 and 37 stand rejected under 35 USC 103 over Palmasi et al in view of Faykish et al and Scheubner. In support of the rejection of claim 1, the examiner asserts that Palmasi et al discloses all of the features recited in the present claim 1, except for the features that:

- (a) the first layer polymeric coating containing non-affixing regions,
- (b) the first layer is substantially inadherable to the carrier film,
- (c) the first layer is less adherable to the carrier than the second layer,
- (b) the non-affix[ing] polymeric coating and the affixing material comprise a UV rotary letter press ink
- (e) the UV rotary letter press ink of the first layer comprises a short chain polymeric substance having a three-dimensional lattice structure, and
- (c) the second (affixing) material comprises a UV rotary letter press ink, comprising a long chain polymeric substance, having a two-dimensional structure.

The examiner suggests that the patterned layer 12 of Palmasi et al is an apt counterpart for the first layer specified in claim 1 and that the holographic image layer 16 of Palmasi et al is an apt counterpart for the second layer specified in claim 1. Palmasi et al discloses that the alleged counterpart for each of the first and second layers comprises a UV resin based on acrylic, urethane and/or epoxy chemicals.

The examiner suggests that Faykish et al discloses a security laminate having a first layer polymeric coating containing non-affixing regions, the first layer being substantially inadherable to the carrier film and being substantially inadherable to the carrier film and the first layer is less adherable to the carrier than the second layer. In support of this suggestion, the examiner cites Figure 2 #12. However, Figure 2 is merely described as showing the security laminate after an attempt to delaminate the

document, and this figure cannot reasonably be interpreted as disclosing a first layer which is substantially inadherable to the carrier film, but only a first layer which is less adherable to the carrier film than to the emblem layer 14 and the adhesion layer 16.

Faykish et al discloses that the bond between the first layer and the protective coating must be relatively strong in order to provide a laminated document with good durability (column 3, lines 28-30), and that, although this bond is the least tenacious, it must be strong enough to provide a durable laminate (column 6, lines 45-48). A person of ordinary skill in the art is thus taught by both Palmasi et al and Faykish et al that that it is necessary for the first layer to bond at least weakly to the carrier film.

Scheubner discloses a self adhesive label having a rather different structure, in which a carrier 3 and a print substrate web 1 are laminated together. As shown in Fig 7 and described in Example 1, a substrate 1 is printed with a front print 11 on one side and a transfer print 12 on the other side. In Fig 8 and Example 2, a substrate 5 is printed with a front print 11 on one side and a transfer print 12 on the other side. The examiner suggests that column 9, lines 26-50 of Scheubner discloses a label including a UV rotary press ink as a non-affixing polymeric coating. Applicant respectfully disagrees with the examiner's analysis, and submits that the passage in question does not disclose or suggest use of a UV rotary press ink as a non-affixing polymeric coating.

The examiner suggests that Scheubner discloses the use of UV rotary letter press inks as both a non-affixing coating (as in the first layer) or as an affixing material (as in the second layer). However, the structure of the Scheubner label, as described above, means that there is no first layer in the sense of a layer which is substantially inadherable to the carrier film, and no second layer in the sense of a layer printed over the first layer. The disclosure of Scheubner with regard to UV rotary letter press inks is merely that they can be used for printing on to a film (see Examples 1 and 2). Scheubner supports the contention previously made that the specific use of UV rotary letter press inks is a limiting feature when in column 2, lines 26 to 36 it discusses the difference between rotary letter press inks and flexographic inks.

The examiner further suggests that Scheubner teaches UV rotary press inks made from a variety of materials. In fact, Scheubner teaches that the “printing inks used for the printing processes described are commercially customary inks from the respective suppliers of label printing inks” (column 9, lines 26 to 28), and the examples utilize commercially available inks. A variety of ink types are discussed, but this discussion gives the person of ordinary skill no teaching regarding inks of different affixability for over printing or their respective molecular structures.

By way of additional background information for the examiner, applicant provides herewith a printout of an information sheet entitled “Surface Wetting & Pretreatment Methods” published by The Sabreen Group, Inc. of Plano, Texas. This information sheet provides information regarding the use of pretreatments such as corona discharge to improve the adhesion of materials to the surface of plastics materials. Such pretreatment is commonly used to improve the adhesion of ink to carrier film, and is in fact used in the processes described in Palmasi et al (column 3, line 61, column 4, lines 25-28) and Scheubner (see Figs 1 and 4, C1 and C2, column 15, lines 21-22 and column 16, lines 33-35). Use of such a pretreatment suggests that any inks applied to the film are intended to adhere to the film, and that if pretreatment is utilised, any layers applied cannot then be “substantially inadherable”. From a consideration of these documents and from general knowledge such as that provided by the information sheet, a person of ordinary skill in the art would be directed to pretreat the carrier film by a method such as corona discharge. In the present case, the applicant realized, against this teaching, that the low bonding characteristic of the carrier film might be utilized, but only if a suitable combination of inks could be identified for the first and second layers. In hindsight, the explanation is that the short chain three dimensional structure has a relatively low surface contact area with the carrier film, and hence is substantially inadherable to a non pre treated surface. The long chain two-dimensional structure has a high surface contact area, providing improved adhesion over the first layer, the difference in adherability being sufficient functionally even on an untreated carrier film to provide satisfactory results.

In view of the foregoing, applicant submits that the subject matter of claim 1 is not disclosed or suggested by Palmasi et al, Faykish et al and Scheubner, whether taken singly or in combination. Therefore, claim 1 is patentable and it follows that the dependent claims 2, 3, 6-16, 19, 20 and 22-36 also are patentable.

The arguments presented above in support of claim 1 regarding differences in adherability are applicable to claim 37. Therefore, claim 37 is patentable and it follows that the dependent claims 38 and 39 also are patentable.

Respectfully submitted,

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